

**Plaintiff Davontae Sanford's Response in Opposition to Defendants' Motion  
for Summary Judgment**

**Index of Exhibits**

- 1 –First Statement
- 2 –Second Statement
- 3 – Crime Scene Sketch
- 4 – Vincent Smothers Deposition Transcript
- 5 – Detroit Police Department Reports re: Runyon Quadruple Homicide
- 6 – Valerie Glover Deposition Transcript
- 7 – Vincent Smothers Affidavit, dated 03/06/15
- 8 – James Tolbert Deposition Transcript
- 9 – Trial Transcript – Day 1, dated 03/17/08
- 10 – Evidentiary Hearing Transcript, dated 07/13/10
- 11 – Davontae Sanford Deposition Transcript
- 12 – Plaintiff's Interrogatory Responses, dated 02/16/18
- 13 – Ernest Davis Deposition Transcript
- 14 – Dale Collins MSP Interview
- 15 – Davontae Sanford Declaration
- 16 – Taminko Sanford Consent Form
- 17 – Davontae Sanford MSP Interview
- 18 – Michael Russell MSP Interview, dated 11/03/15
- 19 – Preliminary Hearing Transcript, dated 10/01/07
- 20 – Michael Russell Deposition Transcript
- 21 – Schwartz Competency Report
- 22 – Expert Report of Dr. Jeffrey Aaron

- 23 – Lynne Schwartz Deposition Transcript
- 24 – Patrick Muscat Deposition Transcript
- 25 – Trial Transcript – Day 2, 03/18/08
- 26 – Sentencing Transcript, dated 04/04/08
- 27 – Ira Todd Deposition Transcript
- 28 – Gravier Search Warrant
- 29 – Vincent Smothers Confession Transcript, dated 04/20/08
- 30 – Evidentiary Hearing Transcript, dated 05/13/10
- 31 – Walter Dandridge Deposition Transcript
- 32 – Promenade Search Warrant
- 33 – Stipulation of the Parties re: chemist Leonora Brun-Conti
- 34 – Barbara Simon Deposition Transcript
- 35 – Motion to Withdraw Guilty Plea, dated 03/13/09
- 36 – Evidentiary Hearing Transcript, dated 07/21/09
- 37 – Letter from Wayne County Prosecutor Kym Worthy
- 38 – Michigan State Police Report re: Runyon Reinvestigation
- 39 – Christopher Corriveau Deposition Transcript
- 40 – Crime Scene Sketch Compilation
- 41 – James Tolbert MSP Interview
- 42 – Michael Russell MSP Interview, dated 09/11/15
- 43 – Homicide Charge Request for Vincent Smothers and Ernest Davis
- 44 – Vacatur and Dismissal Order
- 45 – MDOC Record
- 46 – Taminko Sanford Deposition Transcript
- 47 – Expert Report of James Trainum
- 48 – Gunshot Residue Report

- 49 – Plea Form
- 50 – Defendants’ Response to Plaintiff’s Fifth Requests for Production
- 51 – Promenade Search Report
- 52 – Michigan State Police Ballistics Chart
- 53 – Vincent Smothers Michigan State Police Interview, dated
- 54 – Opinion and Order Denying Defendant’s Motion to Withdraw Guilty Plea
- 55 – Brief for Appeal of Denial of Motion to Withdraw Guilty Plea
- 56 – Renewed Motion to Withdraw Guilty Plea, dated 03/13/09
- 57 – Expert Report of David Balash
- 58 – Expert Report of Dr. Allison Redlich
- 59 – Transcript of Hearing re Motion to Withdraw Guilty Plea, dated 01/07/09
- 60 – Transcript of Hearing re Motion for Discovery of Exculpatory Evidence, dated 02/27/09
- 61— Supplemental/ Amended Motion to Withdraw Plea or Correct Invalid Sentence, dated 12/04/08